

# EXHIBIT A

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

MARK SNOOKAL, an individual, )  
 )  
Plaintiff, )  
 )  
v. ) NO. 2:23-cv-6302-  
 ) HDV-AJR  
CHEVRON USA, INC., a California )  
Corporation, and DOES 1 through )  
10, inclusive, )  
 )  
Defendants. )  
\_\_\_\_\_ )

Videotaped deposition of MARK JORDAN

SNOOKAL, Plaintiff, taken on behalf of Defendants

at 333 South Hope Street, 43rd Floor, Los Angeles,

California, commencing at 10:00 a.m. on Friday,

May 10, 2024, before John M. Taxter, Certified

Shorthand Reporter No. 3579 in and for the State

of California, a Registered Professional Reporter.

1	Q	Okay. And so this 55 percent is the big	16:52:10
2		difference; right?	16:52:14
3	A	Yes.	16:52:15
4	Q	And that's tax-free?	16:52:15
5	A	It is.	16:52:17
6	Q	And then what do you mean by you "only	16:52:19
7		work six months"?	16:52:21
8	A	It's a rotational assignment, so you go	16:52:22
9		for 28 days, and you come home for 28 days, then	16:52:24
10		you go back for 28 days --	16:52:28
11	Q	Okay.	16:52:30
12	A	-- and so --	16:52:32
13	Q	That ends up working six months out of	16:52:32
14		the year?	16:52:35
15	A	It's about six months.	16:52:35
16	Q	Okay. Anything else that would have	16:52:37
17		changed?	16:52:38
18	A	The Escravos position was a PSG 23, 24,	16:52:39
19		and Chevron has policies against keeping people	16:52:45
20		outside of the job's pay scale for, you know, six	16:52:49
21		months, six to 12 months. So usually after six	16:52:54
22		months, if you're moved into a job that has a	16:52:57
23		higher pay scale, they'll re-evaluate you, and	16:53:00
24		generally speaking they'll move you up to that	16:53:04
25		lower pay grade.	16:53:06

1 Q So -- and you were a PSG 22 at the time? 16:53:07

2 A That's correct. 16:53:10

3 Q And so after six months in Escravos you 16:53:11

4 might have been moved up to a PSG 23? 16:53:13

5 A Correct. 16:53:16

6 Q And do you know what the difference in 16:53:16

7 salary would have been? 16:53:17

8 A No. 16:53:17

9 Q Now, what was the assignment in terms of 16:53:26

10 term? Was it a one-year assignment? a three-year 16:53:32

11 assignment? a six-month assignment? 16:53:34

12 A A three- to four-"month" -- or three- to 16:53:38

13 four-year assignment. 16:53:41

14 Q And are you aware that the person who 16:53:43

15 eventually got that job was let go as part of the 16:53:46

16 reorganization? 16:53:49

17 A That wasn't what I was told. 16:53:50

18 Q Okay. What were you told? 16:53:52

19 A He quit. 16:53:54

20 Q What's his name? 16:53:58

21 A I don't know his name. They just told 16:54:00

22 me he quit. 16:54:01

23 Q Who told you he quit? 16:54:03

24 A Actually, I'm not sure I'm supposed to 16:54:07

25 say it. So we had mediation with the DFEH. 16:54:10

1 THE VIDEOGRAPHER: Video deposition 16:56:36  
2 returning to the record at "5:00" -- I'm sorry -- 16:56:37  
3 4:56 p.m. 16:56:42  
4 MS. LEAL: Mr. Snookal was concerned 16:56:43  
5 because he attended a mediation through the DFEH, 16:56:45  
6 and he was advised that everything said during the 16:56:49  
7 course of the mediation was confidential and could 16:56:52  
8 not be disclosed to others. Hence, the reason he 16:56:55  
9 was reluctant to give you the information. I've 16:56:57  
10 told him to go ahead and answer your question. 16:56:59  
11 BY MR. MUSSIG: 16:57:01  
12 Q Great. 16:57:02  
13 A So during that mediation, the mediator 16:57:02  
14 told me that the Chevron lawyer had told her that 16:57:08  
15 the person that took that position after me had 16:57:18  
16 quit after a year because they didn't like it. 16:57:21  
17 Q Okay. Okay. So -- so I think you had 16:57:36  
18 indicated you were -- you were brought on -- you 16:57:38  
19 would have been at the same base salary and might 16:57:41  
20 have been eligible for a bump up to PSG 23 after 16:57:45  
21 six months. You're not sure how much that would 16:57:47  
22 increase your salary. Same benefits, same bonus. 16:57:50  
23 The big difference is that there was 16:57:55  
24 this 55 percent incentive pay that was tax neutral 16:57:58  
25 which is tax-free? 16:58:04

1 assignment. 16:59:01

2 Q Okay. I -- yeah. I'm sure we have 16:59:03

3 documentation. And so, I mean, is it -- is it 16:59:05

4 your position that you -- well -- well, with these 16:59:14

5 facts can you estimate on a yearly basis what you 16:59:16

6 think you would have been making above what you 16:59:18

7 had made in the IEAR team lead position. 16:59:22

8 A I mean, it's probably roughly in the 16:59:25

9 neighborhood of \$90,000 a year. 16:59:28

10 Q And it was a three- to four-year 16:59:35

11 assignment? 16:59:37

12 A Yes. 16:59:37

13 Q Okay. Is there any guarantee that you 16:59:39

14 would have remained in that position? In terms 16:59:40

15 of -- when I say "a three- to four-year 16:59:44

16 assignment," it's not a three- or four-year 16:59:46

17 contract; right? 16:59:49

18 A It's -- it's a job assignment just like 16:59:50

19 any other job assignment. 16:59:53

20 Q Okay. But it's -- you were still an 16:59:55

21 at-will employee? 16:59:57

22 A Yes. 16:59:58

23 Q And so would there have been -- let's 17:00:01

24 say you played out the three to four years and you 17:00:05

25 came back to the US. 17:00:08

1	I suppose your PSG might have gone up,	17:00:09
2	but you would have gone back to essentially the	17:00:12
3	same salary with a slight bump?	17:00:16
4	MS. LEAL: Calls for speculation.	17:00:17
5	THE WITNESS: If I had come back to the	17:00:18
6	U.S.	17:00:20
7	BY MR. MUSSIG:	17:00:20
8	Q Did you have plans to stay in Escravos	17:00:22
9	indefinitely?	17:00:24
10	A I had plans to stay in an overseas	17:00:25
11	position for 11 years.	17:00:29
12	Q And why 11 years?	17:00:32
13	A My son was in private school that I	17:00:33
14	wanted to pay for through high school, so two	17:00:38
15	years of junior high, four years of high school,	17:00:40
16	and saving money for college. And that's three	17:00:43
17	rotations with an average of three and a half	17:00:53
18	years-ish.	17:00:56
19	Q But no guarantee you would have gotten	17:01:01
20	the -- the assignment again; right?	17:01:04
21	A No.	17:01:06
22	Q "No," that's not right, or, "yes,"	17:01:08
23	that's right?	17:01:09
24	A No, there's no guarantee.	17:01:09
25	Q Did you remain a PSG 22 for the rest of	17:01:12

1	your time at Chevron?	17:01:26
2	A I did.	17:01:26
3	Q Do you know what percentage of Chevron	17:01:30
4	employees are promoted to PSG 23? Do you have any	17:01:32
5	estimate?	17:01:35
6	A I do not.	17:01:36
7	Q Are you aware -- maybe you're not --	17:01:38
8	that promotions become harder as you advance up	17:01:41
9	the PS -- pay salary grade scale?	17:01:44
10	A I am aware of that.	17:01:47
11	Q And would you agree that just because an	17:01:51
12	employee at PSG 22 receives performance ratings of	17:01:54
13	meets expectations doesn't mean he'll eventually	17:01:58
14	receive a promotion to PSG 23?	17:02:02
15	MS. LEAL: Calls for speculation.	17:02:04
16	THE WITNESS: It is my understanding	17:02:06
17	that that's true, but I don't know that that's	17:02:06
18	always true.	17:02:09
19	BY MR. MUSSIG:	17:02:10
20	Q Did anyone tell you that you were going	17:02:11
21	to advance to PSG "3" in the REM position in	17:02:12
22	Escravos?	17:02:16
23	A I don't recall.	17:02:17
24	Q Would you agree that, as a result of the	17:02:41
25	COVID-19 pandemic, advancement opportunities at	17:02:45



1	Chevron became harder and harder?	17:02:48
2	A I don't agree with that.	17:02:52
3	Q You think people still advanced at the	17:02:53
4	same rate even throughout the pandemic?	17:02:55
5	MS. LEAL: That calls for speculation.	17:02:57
6	Overbroad.	17:02:59
7	THE WITNESS: I can say that in my small	17:03:00
8	circle of people that I know they continued to	17:03:01
9	advance at the levels and rates that they had.	17:03:04
10	BY MR. MUSSIG:	17:03:04
11	Q Do you know anyone that advanced from a	17:03:08
12	PSG -- PSG 22 to 23?	17:03:11
13	A Yes.	17:03:11
14	Q Who?	17:03:14
15	A Stewart Harwell was promoted, for one.	17:03:18
16	The two people that went into the OA position were	17:03:21
17	promoted. The person that took my IEAR position	17:03:25
18	when I vacated it was promoted from 22 to 23. Two	17:03:29
19	other people were put into OA positions, I can't	17:03:37
20	recall their names, but they came out of	17:03:41
21	engineering leads which are PSG 22s. So it's more	17:03:43
22	than likely they also went from 22 to 23.	17:03:47
23	Q Did any of those people lack a college	17:03:51
24	degree?	17:03:52
25	A I don't know their education or anything	17:03:53

1 STATE OF CALIFORNIA )  
 ) SS.  
2 COUNTY OF VENTURA )

3 I, John M. Taxter, a California Certified  
4 Shorthand Reporter, Certificate No. 3579, a  
5 Registered Professional Reporter, do hereby  
6 certify:

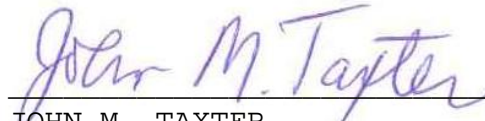
7 That the foregoing proceedings were taken  
8 before me at the time and place therein set forth,  
9 at which time the deponent was put under oath by  
10 me; that the testimony of the deponent and all  
11 objections made at the time of the examination  
12 were recorded stenographically by me and were  
13 thereafter transcribed; that the foregoing is a  
14 true and correct transcript of my shorthand notes  
15 so taken.

16 I further certify that I am neither counsel  
17 for nor related to any party to said action.

18 The dismantling, unsealing, or unbinding of  
19 the original transcript will render the Reporter's  
20 Certificate null and void.

21 Pursuant to Federal Rule 30(e), transcript  
22 review was requested.

23 Dated May 22, 2024.

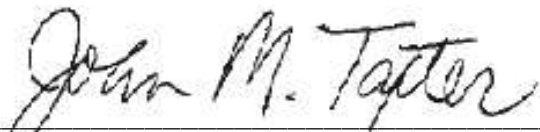
24   
25 JOHN M. TAXTER  
California Certified Shorthand  
Reporter No. 3579, RPR

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I, John M. Taxter, Certified Shorthand Reporter,  
CSR No. 3579, hereby certify:

The foregoing is a true and correct copy of the  
original transcript of the proceedings taken by me  
as thereon stated.

Dated: May 23, 2024

  
\_\_\_\_\_  
John Taxter, CSR No. 3579